

Exhibit G

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
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3 COUNTY OF ALAMEDA

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6 MARLIN LEWIS EAGLES and
7 GEORGIA EAGLES,
8 Plaintiffs,
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No. 22CV018294

vs.

ARVINMERITOR, INC., et
al.,

Defendants.

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12 VIDEOTAPED ZOOM DEPOSITION OF WILLIAM LONGO, Ph.D.
13 VOLUME 3, Pages 282 - 507
14 November 3, 2023
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REPORTED BY:

EARLY K. Langley RMR, RSA, B.A.

CSR NO. 3537

JOB NO: 6298688

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1 Q. That's life.

2 A. I'm talking to myself.

3 Okay. I have it.

4 Q. Okay. So the color in parallel for this
5 particle, M71614-001CSM-001, is that the 08:38
6 approximate color that you identified it as in
7 parallel where it's circled --

8 A. If you go around the edge of the bundle,
9 it's a purplish color.

10 Q. Okay. And then this particle, the next 08:39
11 one, does that appear accurate? This is now
12 M71614-001CSM-002?

13 A. Again, let me get to it.

14 Q. Sure.

15 A. My book is out of order. Somebody is 08:39
16 messing with me.

17 Q. I wish I could claim credit for that,
18 but...

19 A. I understand.

20 1.65, right. 1.68. 08:39

21 I just looked at this, I thought, last
22 night.

23 Okay. 1.002. Here's 002.

24 Okay, I have it.

25 Q. Again, are the circled colors 08:39

1 approximately what you're identifying as particle
2 in parallel as the color?

3 A. Yes. It's what -- you don't see it too
4 well on that photograph, but I'm looking at this
5 one, which I can see the outer -- you know, the 08:40
6 outer edge of the bundle does have that kind of
7 purplish color.

8 Q. And then next particle, M71614-001CSM-003,
9 are the circled numbers approximately what you're
10 calling this particle for purposes of your 08:40
11 analysis?

12 A. 003.

13 168, so we're getting -- starting to get
14 up into the reddish range, pinkish-red. Yeah,
15 that one is blown up some, so I can see it on the 08:41
16 outer side, on the outer edge -- on the edge of
17 the bundle. So yes, I'm good with that.

18 Q. Okay. Last one, I think,
19 M71614-001CSM-004. Is the circled range what --
20 approximately what you're calling this for 08:41
21 purposes of your analysis?

22 A. Let's see. We've got purplish to red to
23 pink. Yes, that's good.

24 Q. Okay. Great. Let me just ask you, since
25 you brought it and we marked it as 36, what do you 08:42

1 at least two orders of magnitude higher.

2 Q. And so that -- that opinion would apply to
3 any cosmetic talc sold by any retailer, large or
4 small, in the United States at any point in time;
5 correct? 12:53

6 A. Yes. But just to make it careful, it's
7 the -- I'm not aware of any other mines than I've
8 already stated in the United States and I'm not
9 aware of any other mines for cosmetic talcs in
10 Europe or Asia such as Chinese, such as Italian, 12:53
11 such as France, such as Brazil, and such as India.

12 Q. But North America, you're -- are you
13 confident in saying that there's asbestos in every
14 bottle of cosmetic talc that was sold at any time
15 in North America? 12:54

16 A. Any bottle that was sold in North America
17 that used a mine source for cosmetic talc in North
18 America will have some level of asbestos in it,
19 and it just depends on the detection limit is --
20 if we can find it or not. So it's all about 12:54
21 detection limits.

22 Q. Okay. But let me take that a little bit
23 further.

24 Do you have an opinion as to what
25 percentage of that talc is at a detection limit 12:55

1 STATE OF CALIFORNIA

2 ss.

3 REPORTER'S CERTIFICATE

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6 I, EARLY Langley, a Certified Shorthand
7 Reporter, State of California, do hereby certify:

8 That WILLIAM LONGO, Ph.D., in the foregoing
9 deposition named, was present via Zoom and by me
10 sworn as a witness in the above-entitled action at
11 the time and place therein specified;

12 That said deposition was taken before me
13 via Zoom at said time and place, and was taken
14 down in shorthand by me, a Certified Shorthand
15 Reporter of the State of California, and was
16 thereafter transcribed into typewriting, and that
17 the foregoing transcript constitutes a full, true
18 and correct report of said deposition and of the
19 proceedings that took place;

20 IN WITNESS WHEREOF, I have hereunder subscribed my
21 hand on November 6, 2023.

22 

23 EARLY Langley, CSR NO. 3537

24 State of California